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March 1, 2024

VIA ECF

The Honorable Victoria Reznik
Federal Building and United States Courthouse
300 Quarropas St., Room 420
White Plains, NY 10601-4150

Re: Natalie Grainger v. Westchester Country Club, Inc., et al.;
Case No. 7:23-cv-01802 (CS) (VR)

Dear Judge Reznik:

We represent Plaintiff Natalie Grainger (“Plaintiff”) and write jointly with counsel for Defendants Westchester Country Club, Inc., Mark Christiana and Tom Nevin (together, “Defendants”) (Plaintiff and Defendants, together, the “Parties”) pursuant to this Court’s Order dated January 30, 2024 to update the Court on the status of discovery. See Dkt. No. 53.

The Parties have completed their respective document productions and have scheduled all party depositions. The Parties have also received document productions from various non-parties pursuant to subpoenas duces tecum, and certain non-party productions remain outstanding. All depositions have been scheduled except for two non-parties, who are available the second week of April. To accommodate these witnesses, the parties respectfully request that the non-party deposition deadline be extended from March 29, 2024, to April 12, 2024. The parties presently anticipate being able to complete fact discovery by April 30, 2024, but will provide a further status update to Your Honor on or before April 15, 2024.

We thank the Court for its time and attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Valdi Licul", with a long horizontal flourish extending to the right.

Valdi Licul

Cc: All Counsel of Record (*via* ECF)